

REMARKS

Claims 1, 2, 4-8, 10, 13, 15-19 and 27-52 remain pending in the application.

35 USC 112 Second Paragraph Rejection of Claim 32

The Office Action rejected claim 32 as allegedly being indefinite under 35 USC 112.

Claim 32 has been reviewed and is amended where appropriate. It is respectfully submitted that claim 32 is now in full conformance with 35 USC 112. It is respectfully requested that the rejection be withdrawn.

Claims 8, 10 and 29-32 over Gupta

In the Office Action, claims 8, 10 and 29-32 were rejected under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent No. 6,374,305 to Gupta et al. ("Gupta"). The Applicants respectfully traverse the rejection.

Claims 8, 10 and 29-32 recite a system and method of deploying content to a mobile client application relying on a non-IP protocol, the non-IP protocol being a Simple Network Transport Protocol.

The Examiner acknowledges that Gupta fails to disclose a non-IP wireless network (See Office Action, page 3). However, the Examiner relies on Gupta's incorporation by reference to U.S. Patent No. 5,580,517 to Verkler et al. ("Verkler") at col. 7, lines 1-40 to allegedly make up for the deficiencies in Gupta. The Applicants respectfully disagree.

Verkler discloses at col. 7, lines 1-40 the transfer of messages to and from various systems employing different operating systems and protocols. Protocols used include TCP/IP, PPP, native published interfaces and mobitex interface (See Verkler at col. 7, lines 1-40). However, Verkler fails to disclose or **suggest** the use a Simple Network Transport Protocol.

Thus, Gupta, including the incorporation by reference reference Verkler, fails to disclose or **suggest** the use of a Simple Network Transport Protocol, much less for a system and method of deploying content to a mobile client application, as recited by claims 8, 10 and 29-32.

As Applicants disclose in Applicants' specification, a benefit of a system and method of deploying content to a mobile client application relying on a Simple Network Transport Protocol (SNTP) is, e.g., features of TCP with a smaller header. Using a UDP-like transport protocol that has many of the features and advantages of TCP, such as being connectionless like UDP but is not limited to message segmentation, message segment reassembly, message retries, and message duplication but has only a four to six byte header. Use of a four to six byte header significantly reduces the bandwidth requirements on a transport network. Reduced bandwidth requirements become a very important consideration when communicating over a limited bandwidth network such as a wireless network. The cited prior art fails to disclose or **suggest** the claimed features having such benefits.

Accordingly, for at least all the above reasons, claims 8, 10 and 29-32 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 1, 2, 4-7, 13, 15-19, 27, 28, 33 and 34 over Gupta in view of Aravamudhan

In the Office Action, claims 1, 2, 4-7, 13, 15-19, 27, 28, 33 and 34 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Gupta in view of U.S. Patent No. 6,563,919 to Aravamudhan et al. ("Aravamudhan"). The Applicants respectfully traverse the rejection.

Claims 33 and 34 are dependent on claims 29 and 8 respectively, and are allowable for at least the same reasons as claims 29 and 8.

Claims 1, 2, 4-7, 13, 15-19, 27, 28, 33 and 34 recite a system and method of deploying content to a mobile client application and a wireless network relying on a non-IP protocol, the non-IP protocol being a Simple Network Transport Protocol.

As discussed above, Gupta's invention is directed to providing alternate paths for a client device to access a server. However, Gupta's system and method fails to disclose or suggest a system and method of deploying

content to a mobile client application and a wireless network relying on a non-IP protocol, the non-IP protocol being a Simple Network Transport Protocol, as recited by claims 1, 2, 4-7, 13, 15-19, 27, 28, 33 and 34.

The Office Action relies on Aravamudhan to allegedly make up for the deficiencies in Gupta to arrive at the claimed invention. The Applicants respectfully disagree.

Aravamudhan appears to disclose a unified mobility manager (UMM) 30 that unifies implementation and processing of mobile communications by various mobile system, such as cellular/mobile telephones, pagers, personal computers, PDAs, etc., that operate on difference communication protocols (Fig. 2; col. 6, lines 16-25). The UMM is capable of receiving messages for different networks, such as mobile IP (Aravamudhan, col. 6, lines 37-51). A mobile device sends a mobile IP message over a wireless network to a protocol gateway using mobile IP (Fig. 5; col. 9, lines 38). The protocol gateway converts a Network Specific Identity to a Network Non-specific Identity (Fig. 5; col. 9, lines 38).

Aravamudhan discloses a method and apparatus for allowing a plurality of devices using a plurality of protocols to use a centralized system for conversion to a generic format to access a Unified Directory Service (Fig. 5). A mobile IP device sends mobile IP protocol messages over a mobile IP protocol network for access to a Unified Directory Service (Aravamudhan, Fig. 5). Thus, Aravamudhan fails to disclose or **suggest** a system and method of deploying content to a mobile client application and a wireless network over a non-IP protocol, much less the non-IP protocol being a Simple Network Transport Protocol, as recited by claims 1, 2, 4-7, 13, 15-19, 27, 28, 33 and 34.

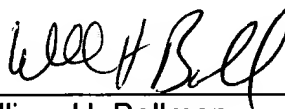
Thus, even if it were obvious to modify Gupta with the disclosure of Aravamudhan (which it is not), the theoretical result would use one or more of TCP/IP, PPP, native published interfaces, mobitex interface and mobile IP protocol NOT a Simple Network Transport Protocol, as recited by claims 1, 2, 4-7, 13, 15-19, 27, 28, 33 and 34.

Accordingly, for at least all the above reasons, claims 1, 2, 4-7, 13, 15-19, 27, 28, 33 and 34 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,
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